

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED  
SOCIETIES, *et al.*,

*Plaintiffs,*  
v.

MICHAEL MCDONALD, in his official  
capacity as Acting Chairman of the National  
Endowment for the Humanities, *et al.*,

*Defendants.*

Case No. 1:25-cv-03657

**DECLARATION OF RENATA KOBETTS MILLER**

I, Renata Kobetts Miller, declare as follows:

1. I am Dean of Humanities and the Arts at The City College of New York (“City College”), which is a constituent college of the City University of New York (CUNY).
2. City College is an Associate member of the American Council of Learned Societies. I am a member of the Modern Language Association.
3. I or one or more colleagues in the Division of Humanities and the Arts at City College would have applied for one or more grants from among the following programs, had they not been cancelled: Humanities Initiatives at HSIs, Humanities Connections, and Digital Humanities Advancement Grants.
4. In my capacity as Dean and, earlier, Deputy Dean of Humanities and the Arts at City College, I have served as Principal Investigator or Co-Principal Investigator on three NEH institutional grants, in the Humanities Initiatives at Hispanic-Serving Institutions (HSIs), CARES (Coronavirus Aid, Relief, and Economic Security), and ARP (American Recovery Plan) grant programs. Together, they provided City College over \$900,000 in support of new academic

programs, pedagogical models that connect classroom learning to experiential learning with community partner organizations and thus help prepare students for careers after graduation, and the use of new technologies to foster more active and engaged learning. Our CARES grant specifically allowed us to retain a cohort of 25 part-time faculty whose jobs would otherwise be lost as a result of state funding cuts during the Covid-19 pandemic, and other grants supported the creation of new full-time jobs in the humanities. Additionally, City College humanities faculty have regularly received research funding from the Fellowships for Hispanic-Serving Institutions award competition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2025 in New York, NY

A handwritten signature in black ink, appearing to read "Renata K. Miller", written in a cursive style.

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Renata Kobetts Miller